

Re: Depo Follow Up: Discovery to be produced (by 3/17)

Penn Dodson <penn@andersondodson.com>

Sun 3/19/2023 6:31 PM

To: Louis Lombardi <louis@joneslawnyc.com>; Tanner Bryce Jones <bryce@joneslawnyc.com>

Cc: Christopher Anderson <christopher@andersondodson.com>; Jessica Velez <admin@andersondodson.com>

We have not heard back from you at all on this.

Unless we receive this from you by EOD Mon 3/20 we will have to let the court know that we have another discovery dispute on our hands.

On Mar 7, 2023, at 12:41 PM, Penn Dodson <penn@andersondodson.com> wrote:

Following are the categories of supplemental information/ documents/ data your client testified about that she needs to produce within the next 10 days please:

- Accountant contact information (name, address, email, phone). Current and previous (one is recently deceased.)
- Bank Account info (TD Bank and Bank of America)
- Written firm policy on when employees are and are/not exempt, if one exists.
- Internal communications between and amongst HR, exec team and/or attorney re: exemption status. [Note: even if an attorney was involved, this would not be privileged if the Defendants intend to rely on it at all for the good faith defense. (The caselaw is quite clear on this.)]
- Any and all documents relied upon for forming the HR policy regarding employee exemption generally, and Sade's specifically.
- Identity and contact info of lawyer upon whose advice firm relied for determining exemption status
- Identity and contact info of accountant upon whose advice firm relied for determining exemption status
- She will check whether time keeping was part of her software when Sade was there
- Audio files from What'sApp
- Image files from What'sApp
- Verify responses to Rogs and RFPs
- Record of paid time off for Sade
- Answer to question "was Daily Audit" removed from SOP prior to Sade's employment
- Internal email, Whats App, and/or Slack communications re: Sade
 - Performance
 - "Food Incident"
 - Playing Games at Work
 - "Stealing"
 - Discipline
 - Termination
- Any and all written warnings or other communications to Sade re: the same

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<image001.jpg>

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